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12 Attorneys for Plaintiffs

13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15
16 "AMY," "ERIKA," JANE SMITH, as next of
friend for "TORI," minor, "JENNY," and
17 "JESSICA," "LILY," "SARAH," JOHN DOE
18 as court appointed conservator for "SIERRA,"
and "SALLY," minors, JANE DOE as court
19 appointed conservator for "SKYLAR" and
"SAVANNAH," minors, "MAUREEN,"
20 WILLIAM L.E DUSSAULT as Guardian ad
Litem for "VIOLET," minor, JANE ROE, as
21 next of friend for "PIA," and "MYA," minors,

22 Plaintiffs,

23 v.

24 RANDALL STEVEN CURTIS,

25 Defendant.
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Case No: 4:19-cv-02184-PJH

DECLARATION OF JANE ROE IN SUPPORT OF
MOTION FOR APPROVAL OF MINOR
SETTLEMENT RE PIA

HEARING DATE:
TIME: 10:00 am
COURTROOM:

BEFORE HONORABLE MAGISTRATE JUDGE
LAUREL BEELER
UNITED STATES DISTRICT COURT

1 I, Jane Roe, hereby declare the following:

2 1. I, Jane Roe, am the mother of the minor plaintiff "Pia" herein and am the person known
3 as "Jane Roe" in this matter. I am the exclusive legal guardian for Pia, appointed by the court in our
4 home jurisdiction. I make this declaration in support of the motion of the parties for approval of the
5 proposed settlement of the claims herein.

6 2. My daughter has been represented by Ms. Hepburn and Ms. Bianco since 2016 in
7 matters relating to her rights as a victim of child pornography crimes. Ms. Hepburn, Ms. Bianco and I
8 have discussed the nature of the claims which may be made on her behalf. We have also discussed the
9 processes involved in proceeding to trial with a civil claim.

10 3. At the time this matter was filed, my daughter "Mya" was also a minor and I was
11 named as her "Next Friend." She has since reached the age of majority and is competent to make her
12 own decisions and handle her own legal matters.

13 4. I have reviewed the motion and the declarations of Carol L. Hepburn, Deborah Bianco,
14 and John Kawai, supporting the motion to approve the settlement. It is my understanding that each of
15 the plaintiffs including my daughter would receive an equal pro-rata portion of the gross proceeds of
16 the settlement and also be responsible for an equal pro-rata share of the costs of the litigation. I
17 understand that this settlement would provide a gross amount of \$ [REDACTED] to each plaintiff including
18 my daughter, and a net payout to each of \$ [REDACTED].

19 5. I believe that the proposed settlement is a fair and reasonable one in that it provides a
20 certain recovery to each of the plaintiffs in the near term without the expenditure of additional costs
21 for trial and for collection.

22 6. I am in agreement with the allocation of one third of the gross recovery for attorneys'
23 fees in this matter. At the outset of my engaging Ms. Hepburn and Ms. Bianco to represent my
24 daughter, I entered into a fee agreement providing for a one third contingency fee together, payable to
25 Ms. Hepburn and Ms. Bianco jointly, with reimbursement of reasonable out of pocket costs which
26 they might expend. I further understand that it was necessary for Ms. Bianco and Ms. Hepburn to
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1 associate with Mr. Kawai, as local counsel, in order to file this lawsuit, and that Mr. Kawai will be
2 entitled to share in the one-third contingency fee.

3 7. I have reviewed the listing of costs expended in this matter totaling \$ [REDACTED] and
4 understand that my daughter Pia would pay \$ [REDACTED] from their gross settlement for reimbursement
5 of these. I have no objection to reimbursement of this amount.

6 8. All monies received on behalf of my daughter, Pia, and including any funds coming
7 from the resolution of this case, are placed into an account for her benefit. All funds are used solely
8 for her benefit. I have no objection to placing funds from this action in a blocked account for her
9 benefit that will have no withdrawals without court order until she reaches 18 years old. There is
10 already such an account established for her benefit into which we can place the funds from this case.

11 9. I ask on behalf of my daughter, Pia, that the court approve this settlement as proposed
12 in the motion.

13 I hereby declare under penalty of perjury under the laws of the United States of America that
14 the foregoing is true and correct to the best of my knowledge.

15 DATED this 14 day of July, 2021.

16 [REDACTED]
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18 Jane Roe as legal guardian and mother of Pia
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